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to and without waiving said objections, plaintiff states he has at no time during the course of this action alleged history of community based Wiccan religious practices.

EXHIBIT

I

INTERROGATORY NO. 4

Please describe in detail the beliefs, tenents, and practices of Wicca, including daily prayers, worship services, religious gatherings, religious celebrations or holidays. Include within your response a description of all religious materials or items used in Wiccan religious practice or beliefs in any way, including, but not limited to, all books, bibles, volumes, writings, articles, items, clothing, artifacts, musical instruments, prayer beads, necklaces, statutes[sic], music, videos, CDs, audiotapes, photographs, etc. For each item listed, please describe it in detail and describe the religious significance of each item.

ANSWER NO. 4

Plaintiff objects to this interrogatory on the grounds that it is vague, unduly burdensome, and overly broad. Subject to and without waiving said objections, plaintiff states: My own experience has taught me that if you were to ask one dozen people who claim to be Wiccan exactly what the beliefs, tenets and practices of Wicca are, you would get at least a half-dozen different answers, and each answer could probably be tied to some acceptable reference source. There are many Traditions of the Old Religion and many Paths within each Tradition. That said the responses plaintiff provides to this interrogatory are his own and are based on the plaintiff's own research sources and the plaintiff's personal understanding of his chosen path

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and Tradition. There is no "one and only way" to work the Craft and worship our deities. We all have some differing understanding or interpretation of many aspects of the Old Religion, and each one of these interpretations is, by definition the correct one for those who embrace it.

Wicca is a religion rooted in neolithic history. By whichever name you choose to call it—Wicca, the Old Religion, Witchcraft, or the Craft of the Wise — it is basically a fertility and agrarian religion. It is a religion of nature worship and the subsequent interaction with nature that is descended from that practiced by the Celtic clans of Western Europe and the indigenous people of the British Isles. Wiccans acknowledge and worship the old gods and goddesses in a manner that has remained essentially unchanged for thousands of years regardless of the tradition of the practitioner. The religion of Wicca, the Old Religion, is a loving and peaceful Pagan religion of nature and Earth worship. It is tied to the phases of the moon and the seasons of the year as defined by both lunar and solar astronomical events. It is oriented toward agrarian fertility celebrations and recognizes both a female goddess and a male god as equal deities. It is first and foremost a veneration of our Lord and Lady. The goddess and the god are equal and exist together in each and everything in and on this Earth, including ourselves, so that we are a part of the god and the goddess just as they are a part of us. We and our deities are all linked together as part of the life force or cosmic energy that flows through all things, both animate and inanimate. Wiccans become in tune with this force, or energy during rituals. Wiccans understand and are in tune with the

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seasons, the natural order of changes in nature and the universe. Wiccans believe that death is part of life just as night is part of day. You can not have one without the other.

In Wicca, there is no devil worship or the worship of devil figures such as Satan or the Antichrist, and there is no such thing as a black mass where Christian litanies are pronounced backward and Christian symbols are defamed. The devil and hell are parts of the Christian theology. They simply do not exist in Wicca. There is no sexual contact with animals or any other acts of bestiality in Wiccan ritual, and there is never any type of blood sacrifice at our rituals, for any purpose. Wiccan rituals do not include orgies or public displays of sexual acts. Some Wiccans do choose to practice skyclad (nude) for specific rituals, this is not mandatory and is always practiced with the full knowledge and understanding of all Coven members. Since Wicca is essentially a fertility religion, there are some rituals or rites that do have an overt sexual meaning. Magic aimed at harming someone is also not done at Wiccan rituals.

Daily prayers are preformed through meditation. A Wiccan will typically take a certain time in his day, go to a quiet spot, light incense and candles, sit in a comfortable position, generally on some type of cushion or zafu, and gaze in an unfocused way at the incense smoke or candle flame. Once comfortable you place yourself into the meditative state. There are several levels of meditation one can go into ranging from the alpha state to the theta state. These states usually last 15-30 minutes or longer as needed.

There are eight festivals or celebrations(holidays) in

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the Wiccan year; four major festivals and four minor festivals, and four minor festivals, referred to as Sabbats. The festivals surrounding a Sabbat can last for several days, but the actual ritual performed in honor of the God and Goddess is typically held on the evening before the day of the actual event. The eight Sabbats are:

1. YULE. Celebrated at the Winter Solstice, the shortest day of the year, on or about December 21. Yule is the celebration of the Goddess becoming the Great Mother, giving birth to the God who died at Samhain (sow-en) of the previous year. It is celebrated as the sun returns after the longest night of the year. The wreath is a typical Yule decoration, representing the Wheel of the Year. It is usually made of holly interspersed with pine cones representing the God and either fruit or small sea shells representing the Goddess. A Yule log is also typical, and is burned throughout the night until sunrise the following morning. The altar candle for Yule is purple or dark green. Some change the color of the God and Goddess candles from the more traditional red and white to red and dark green for the Yule Sabbat celebration. Typical decorations include holly, mistletoe, pine branches, or pinecones.

2. IMBOLC. Celebrated on February 2. It is the time of year when the God steps aside in favor of the Goddess and the first plantings of spring crops occur. This is the time for the Earth Goddess to prepare for the return of Her consort, the Sun God. Lighting of ritual bale fires occurs at Imbolc to symbolize the banishing of darkness and to encourage the return of the sun's light. A major symbol of Imbolc is the Candle Wheel, a small circular frame with candles carried into

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the ritual circle. Imbolc is traditionally the time for spiritual cleansing and dedication. The typical colors of the altar candle are pink or pale green. Altar displays include seeds and nuts.

3. OSTARA. Celebrated at the Spring Equinox, on or about March 21. It represents a new beginning, a rebirth of life as the first new plants emerge, and is celebrated with feasting. This is the time of balance between day and night, the time when light overtakes the darkness. It is the time of sexual union between God and Goddess, symbolizing the fertility of the year to come, and is traditionally accepted as the time when the Goddess first consummates her love with the Sun God and becomes impregnated with the new God, who will be born at Yule. This festival is symbolized by eggs as the meaning of new life. The decorations for Ostara should be any of the spring flowers, and the altar candle is light green.

4. BELTAIN. Celebrated on May 1. It is typically presided over by the Goddess and represents the end of the spring planting season. Beltain is derived from the Celtic for "balefire", which are lit for the Beltain Sabbat celebration. Wiccans typically take a portion of the burning wood from the fire to light the altar candle. Jumping over a smouldering balefire is thought to insure protection for the individual, likewise any ritual tools or clothing you wish to purify may be passed through the smoke of the Beltain fire. Bells are typically rung on Beltain morning to scare away bad spirits. Any spring flower, in particular the rose, is a symbol of Beltain. The altar candle is usually white although red or pink are acceptable.

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5. LITHA. Celebrated at the Summer Solstice, the longest day of the year, on or about June 21. It represents the peak of the God's strength. Both the Goddess and the Earth have been impregnated, and Litha rituals are preformed to protect and continue these pregnancies. It is the custom on this night to light large bonfires after sundown, which serve the purpose of providing light to the revelers and warding off evil spirits. The two chief icons of the Sabbat are the spaer, as a symbol of the Sun God and the cauldron as the symbol of the Goddess in her bounty. Decorations for Litha are any summer flowers, and the altar candle is usually white or pale yellow.

6. LUGHNASADH (lew-nassa). Celebrated on August 1. It is the time the Goddess yields to the God as winter approaches and is the first grain harvest festival. Portions of the first harvest feast are usually returned to the Earth to honor the Goddess for Her part in bringing forth the first yields of the winter harvest, and to ensure that the remaining crops thrive until their time for harvest. The Sabbat is one of feasting, it is customary to eat samples of each of the grains, melons, and fruits harvested at this time, including consumption of various breads, particularly corn bread. Nuts and grains, as well as late summer flowers, are typical decorations for the Sabbat, and the altar candle is usually gold or light yellow. A piece of fruit symbolizing the perfect fruit of harvest is aerved at this ritual, and a loaf of cornbread is usually used as part of the Cakes and Ale rite.

7. MABON. Celebrated at the Autumnal Equinox, on or about September 21. It represents another day of balance between light and dark, but is the time when darkness overtakes light.

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This is the Wiccan day of thanksgiving and is a celebration of thanks for the bounty of the previous year. Again a portion of the ritual feast is returned to the earth to honor the Goddess. Mabon decorations include any of the harvest foods, particularly wheat, corn, apples, grapes and peaches. The altar candles are usually either dark brown or red.

8. SAMHAIN (sow-en). Celebrated on October 31. It means "summers end" in Celtic. This is the end of autumn and the beginning of winter. In the ancient dual division of the year summer ran from Beltain to Samhain, and winter from Samhain to Beltain. Samhain is thus the Wiccan New Year Sabbat and is a God dominated holiday. The two themes of Samhain are celebrating the dead and attempting to see the future. As a feast of the dead, it was believed the dead could, if they wished, return for this one night. Extra places are set at the table and food is set out for anyone who died that year. It is also traditional to leave food or drink at the doorstep on this night to refresh those souls who may be wandering between the two worlds. The Samhain Sabbat celebrates the eternal cycle of reincarnation and marks the beginning of winter. The old God dies tonight to be reborn at Yule and the Wheel of the Year will continue. Feasting from the fall harvest and final slaughter of the herds is typical of this celebration and can result in lavish Samhain ritual meals. Fall fruits such as apples, harvest foods of gourds and melons, and fall grains and nuts are typical Samhain decorations. The altar candle is typically brown.

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Both the major and minor Sabbats are festivals of rejoicing or celebration, and no magical work is done at these rituals. The Sabbats are solar-driven, representing celebrations directed at fertility, life, death, and rebirth.

Wiccan "worship services" are called Esbats. These rituals are held at specific phases of the lunar cycle in order to acknowledge the Lady in Her aspect of the Lady of the Night Sky or do work in the form of spell craft or other magick. The Esbats are typically held at the full moon if worshipping the Lady in her nurturing or mother aspect; at the dark moon if some of our stronger more basic emotions are involved; and at the appropriate quarter moon, if specific magickal work is to be done. The full moon esbat is a recognition and acceptance of the Goddess, an understanding of Her presence. It is time to acknowledge Her as creatrix and protectress and to give thanks for Her guidance and love. The full moon esbat is done in a cast circle, and should be preformed on the exact night of the full moon, optimally, but no more than one night on either side of the full moon night. It should be done outside fairly soon after moonrise when the moon is in view and can shine on the worshiper. The dark moon esbat is a recognition and acceptance that there is also a dark side to the Lady. In this aspect She can be chaotic, angry and petulant. It is not uncommon for the High Priest to take a dominant roll in this rite (as opposed to the High Priestess who usually leads most rites and rituals). This is a time when strong protection or defensive work can be done. It is also the time to look deep inside one's self, and get in touch with the darker baser elements of the psyche, and the time to recognize and deal with aggression, anger, and

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fear.

The Sabbat festivals and esbat ceremonies are times when special rituals are done, and, as a part of those rituals, Wiccans perform specific rites. (i.e. the rededication rite is done during the Imbolc Sabbat ritual). There are many rites within Wicca that are done in conjunction with other rites or rituals, and many that can be done independent of a supporting ritual. Some of these rites are:

1. The Consecration, Dedication, or Initiation Rite - the rite in which you dedicate yourself to the God and Goddess.

2. The Cakes and Ale Rite - performed in conjunction with both esbats and Sabbat rituals, similar in meaning to the communion rites in other religions.

3. The Consecration of Tools - performed before any tool is brought into the circle to be used in ritual or magickal acts.

4. The Raising Power Ritual - the channeling and directing of energy and power that is drawn through the covenors from the Earth.

5. Drawing Down the Moon - generally associated with the full moon esbat, it is a rite wherein the High Priestess functions as the Goddess incarnate.

6. Drawing Down the Sun - the companion rite of Drawing Down the Moon is similar but the God is drawn down into the High Priest.

7. The Great Rite - typically done at Beltain Sabbat. It represents the sexual union between the God and Goddess. This rite takes many forms from the purely symbolic to the more graphic. For the purely symbolic, the High Priestess holds

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a cauldron or chalice (a vaginal representation) and the High Priest holds an athame or wand (a phallic representation) and the athame or wand is placed into the chalice or cauldron.

8. Hand Fasting Rite - the Wiccan marriage ceremony.

9. The Crone Rite or Croning - done by older practitioners in recognition of the more mature aspect of the Goddess.

10. Passage to Summerland - the Wiccan funeral ceremony. These rites, I believe, are more or less common to most of the major Wiccan Traditions.

There are many tools and implements used by Wiccans. I believe the following to be a fairly comprehensive list of "religious materials or items used in Wiccan religious practices or beliefs in any way....". however there may be an instrument or tool I have inadvertantly neglected to to include. In that case, I apologize for any unintentional oversight.

ALTAR - round or square, natural materials no metal in the construction, large enough to hold all other tools used in rituals.

ALTAR CANDLES - generally three candles are placed on the altar; a white Goddess candle, a red God candle, and an altar onworking candle whose color is representative of the rite or ritual being preformed. The typical colors of the working candle are: red, orange, yellow, green, blue, violet, pink, white, black, and gold. These candles are generally of either the pillar or taper style.

ALTAR CLOTH - large enough to be draped over the top and front of an altar. Its color is representative of the season, i.e. pastels for spring and early summer, reds or dark greens for summer and early fall, and orange or black for fall and

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winter.

ALTAR DECORATIONS - these are representative of the Sabbat ritual being preformed, and can include: seasonal flowers, seasonal harvest crops i.e. fruits, nuts, vegetables, gourds, etc, a Yule Log, wreaths of holly and pinecones, a Candle Wheel, corn dollies etc.

ATHAME - generally a double-edged, dark-handled knife with a blade of 5 or 6 inches in length. The balde edges are not sharpened. This tool is not considered a weapon. It is used in many rites and rituals, to mark the perimeter of the circle, to stir the salt and water used in consecrating the circle, a marking implement to carve words or symbols on candles used in candle magick, and the phallic representation in the symbolic Great Rite. The athame should be wrapped in a white cloth when not in use.

BAGS - cloth with a drawstring, in various sizes and colors used to hold various ritual items when not in use and as the receptical for the components of some magickal workings.

BELLS - various sizes, an altar bell can be used to signal the start of the ritual, smaller bells will be used by the Covenors especially during Beltain Sabbat celebration.

BESOME - a sacred broom used to sweep away any energies lingering around an area where a circle is to be cast.

BOLINE - a small very sharp white handled knife with a curved blade resembling a small sickle, the balde is generally made of copper not steel. It is used for cutting or preparing herbs.

BOOK OF SHADOWS - a personal Book of Shadows is kept by each Wiccan in the Coven. The Coven also maintains a Book of

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Shadows, which is usually under the control of the High Priestess. The Book of Shadows contains all ritual and spellcraft information. It is the working guide to written incantations, invocations, rites, and spells and the mysteries. The Coven Book of Shadows is generally copied into each Wiccans personal Book. A Book of Shadows should ideally be done in ink and in the Witch's own handwriting. It is an integral implement of the Sacred Circle and sits on the front of the altar.

BOX - small, wooden boxes are used to store items in when they are not in use, i.e. the athame, tarot cards, boline etc.

CAULDRON - has many uses, from holding a small balefire at Beltain to functioning as the female counterpart to the male athame in a symbolic Great Rite. It is used to burn any incantations used in spell work or to burn a Covenor's written request to the deities in some rituals.

CHALICE - a glass or metal drinking goblet. Used in the initiation rite, as the vaginal representation in the symbolic Great Rite and during the Cakes and Ale rite performed in conjunction with all other rituals.

CORDS - 3' lengths of various colors, representative of the type of Cord Magick being performed. Commonly red, black, and white.

CRYSTAL BALL and STAND - used for the foretelling of the future. one of many divination tools used by Wiccans. Usually 50mm - 200mm in diameter and should be stored in a black bag when not in use.

DRUM - used in Raising Power rites, Sabbat celebrations and to help in entering a meditative state. A drum similar to those used by Native Americans is the most commonly used.

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FLUTE - used to induce a meditative state and during Sabbat celebrations.

INCENSE and HOLDER - the type used is representative of the ritual or rite being preformed and can be found in stick, cone and powdered, with cone being safe and easy to use and available in most scents. The burning incense represents the elements of both air and fire and is used in the consecration of th circle, meditation, and most other rites and rituals.

MIRROR BOOK - essentially a daily account of a Covenor's progression as a Witch, in which you should keep notes on rituals attended, your feelings and impressions. The Mirror Book is a very personal document, and along with the Book of Shadows the most important tools of a Witch and should be protected accordingly.

MORTAR and PESTAL - used in the preparation of herbs that will be used in incense, teas or herbal remedies. Usually made of stone or heavy ceramics and not typically kept on the altar.

MUSICAL INSTRUMENTS - used during Sabbat celebrations. Any instrument may be used, however, instruments with a medieval flair seem to be most popular.

OILS - scented oils are used in initiation, consecration and purification rituals. Pure essential oils are preferred. The scent of the oil used is representative of the rite or ritual being preformed. (the scents currently approved are inappropriate for Wiccan use within this facility as they are generally for love or lust spells).

PENDULUM - a simple tool of divination made from a small light weight, usually crystal, stone or metal, that is attached to the end of a cord, string, or light chain.

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PENTAGRAM SYMBOL - the basic symbol of Witchcraft. It is the focal point for spell work and is generally placed in the center of the altar. The altar candle or the athames of the High Priest and Priestess can be placed on the pentagram. The 5 points of the pentagram represent the elements of spirit, Earth, Air, Fire, and Water.

PURIFYING SAGE - generally comes in small bundles or braids, and gives off a lot of grey-white smoke that is a purification agent used to remove negative or other unwanted energies from the area in which a circle is to be cast. Sage should be used the first time a circle is cast in a new area and any other time when incense will not suffice (example when other people use the space your circle is cast in).

QUARTER CANDLES - there are four (4) quarters used in casting a circle, sometimes called the Guardians or Watch Towers, with each represented by an individual colored candle: Green for North (earth), Yellow for East (air), Red for South (fire), Blue for West (water). These candles are generally either pillar or votive style.

RATTLE - used in Raising Power Rites and Sabbat celebrations, frequently made from a dried gourd.

ROBES - floor length robes or cloaks, hooded or not, are used by those covens that do not work skyclad (nude) or only work skyclad for certain rituals and rites. Robes come in many colors and materials with darker colors and lighter materials seeming to be preferred.

RUNES - symbols that comprised an alphabet used by Celtic tribes, the Elder Futhark, and inscribed on stone, bone or wood and are a tool of divination in Witchcraft.

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SALT and SALT CONTAINER - salt is one of the purification agents (representing earth) used in casting a circle and is held in a glass ceramic or stone dish. (It should be noted that Wiccans, being followers of an Earth/nature worshiping religion, only use tools and other items made of natural materials during rites and rituals. Synthetic materials interfere with the energies Wiccans attempt to become attuned with during rituals.) Any type of salt will do, but, sea salt is typically preferred. Salt mixed with water (the water of the wise) represents the elements of earth and water for consecration of the circle and some initiation and dedication rites.

SCRYING MIRROR - generally a flat or convex mirror, backed in black, 6" - 8" on a side, used as a tool of divination in Witchcraft, wrapped in a white cloth when not in use.

SEA SHELLS - representative of the Goddess in many rituals, especially the Yule celebration.

STATUARY - a group of statues representing the numerous Gods and Goddesses worshiped by Wiccans during various rituals and rites.

STONES - various shapes and types are used for storing energies and directing energies. These can range from cristalline clusters in their natural form to polished and shaped materials such as pyramids, feng shui, and spherical, egg or otherwise shaped stones.

SWORD - generally a double edged blade, 2½'-3' long. The blade edges are not sharpened. this tool is not considered a weapon. It is used to cast the circle and to direct energy during various rituals and rites.

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TAROT CARDS - a deck of generally 78 cards, divided into 4 suits of 14 cards each (pentacles or coins, wands or staffs, cups, and swords) called the minor arcana and 22 cards called the major arcana. These cards are a tool of divination.

WAND - there are many rituals which specify the use of a wand. Wands come in many shapes, styles, and materials. A suitable length portion of a branch of a tree which has from the tree can be trimmed to the right length, sanded and marked in the appropriate manner. A length of dowel will also work.

WATER CONTAINER - water is another of the circle purification agents. The water container or bowl should be large enough to allow the addition of three pinches of salt and be stirred. The container should be made of glass ceramic or stone.

ZAFU - or similar meditation cushion.

It would not be possible to list "all books, volumes, writings, articles" used in Wiccan religious practices or beliefs. Each and every Wiccan should have a Book of Shadows and Mirror Book. Wiccans should always strive to further their education in the craft, and should therefore have access to as many books related to Wicca as possible to facilitate this process. A list of the books offered by two vendors has been provided in Plaintiff's Response to Defendants' First Request for Production of Documents.

INTERROGATORY NO. 5

Please describe in detail the Wiccan religious practices you engage in while confined to the Treatment Center, including individual prayers, corporate worship, and all religious celebrations. Please identify each and every Wiccan religious